



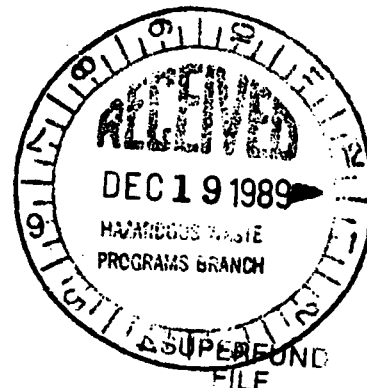
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

December 18, 1989



MEMORANDUM

Subject: ~~Falcon Steel~~ - Kaufman, TX
EPA I.D. ~~TXD058667973~~

From: Bill Honker, Chief *Bill Honker*
RCRA Permits Branch (6H-P)

To: Guanita Reiter, Chief
RCRA Programs Branch (6H-H)

FEB 11 1993

REORGANIZED

A congressional form of Kaufman, Texas to President George Bush dated June 13, 1989. concerning Falcon Steel was received in our Branch. In this letter requested specific data relating to ongoing cleanup programs and site inspections regarding closure of hazardous waste pits or lagoons. She also wanted to know if the lagoons were still leaking during heavy rainfall and are the ground water monitor wells being monitored for lead and chromium.

This facility is engaged in steel fabrication and hot dip galvanizing. This plant conducts post-closure activities for five closed surface impoundments as per the draft post-closure care plan. TWC previously classified the waste placed in these impoundments (spent pickle liquor) as a listed hazardous waste as described under K062. On May 28, 1986, EPA stated that the K062 listing applied only to waste generated by iron and steel facilities, which does not include zinc galvanizing operations. On August 7, 1986, TWC reclassified the waste as corrosive and EP toxic. However, TWC also stated that if the waste could be treated to render it nonhazardous, the impoundments could be closed as Class II nonhazardous landfills. The company has lime stabilized and capped the surface impoundments as required, resulting in reclassification as Class II nonhazardous landfills. Closure certification was submitted to TWC on March 16, 1987. It appears that due to the EP toxic for lead and chromium, that this unit should have been closed as a RCRA unit and it was not.

The monitor wells are still in place but the latest groundwater analytical results were not available in EPA files. The closure plan states that lead, chromium, and other constituents were to be analyzed. The construction of the monitor wells may not be adequate. Jon Rinehart, of my staff, called TWC closure unit and spoke to Grace Montgomery. He then asked her to look into the closure of these surface impoundments. She said she would and then get back in touch with us.